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Attorneys for Plaintiff
UNITED STATES FIRE INSURANCE COMPANY

THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES FIRE INSURANCE
COMPANY,

Plaintiff,

vs.

THE ROMAN CATHOLIC BISHOP OF
OAKLAND, a corporate sole,

Defendant.

CASE NO. C 05 1203 MMC

**STIPULATION AND ~~PROPOSED~~
ORDER TO STAY ACTION**

Plaintiff UNITED STATES FIRE INSURANCE COMPANY ("US FIRE") and
defendant THE ROMAN CATHOLIC BISHOP OF OAKLAND ("the DIOCESE")
(collectively "the parties") by and through their attorneys of record identified below
hereby enter into the following Stipulation to Stay Action:

WHEREAS, there are multiple related, pending actions filed by individuals
against the DIOCESE in the process of settling;

WHEREAS, since at least February 2005, under the oversight of Judge Ronald
Sabraw with the Alameda Superior Court, these cases against the Oakland Diocese
have been the subject of extensive settlement negotiations;

WHEREAS Judge David Hunter of the Alameda Superior Court is actively meeting with the parties in the underlying cases and based upon this the parties in this lawsuit are reasonably optimistic that the underlying suits may settle;

WHEREAS, the parties want to give the underlying actions a fair opportunity to settle before incurring fees and costs in this action;

WHEREAS, if the underlying suits settle, this litigation will not be necessary; and

WHEREAS, staying this action for three months will give the underlying actions a reasonable amount of additional time to settle after which time, if there is no settlement, the case can proceed.

NOW, THEREFORE, IT IS HEREBY AGREED, STIPULATED AND ORDERED THAT:

1. All proceedings in this action shall be stayed until October 1, 2005. All previously set dates shall be taken off calendar, including the case management conference scheduled for July 22, 2005.

2. The parties' last day to meet and confer pursuant to Rule 26(f) of the Federal Rules of Civil Procedure shall be moved to **October 3, 2005**.

3. The parties' last day to serve their initial disclosures pursuant to Rule 26(a)(1) and to file and serve their discovery plan pursuant to Rule 26(f) shall be **October 14, 2005**.

4. A case management conference shall be held on October 21, 2005 ~~(date to be determined by the Court)~~.

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From-GORDON REES LLP

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Dated: June 24, 2005

Bv:

Dated: June 24, 2005

By:

IT IS SO ORDERED.

DATED: June 27, 2005

THE HON. MAXINE M. CHESNEY

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